

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

HIGH TECH REPUBLIC, INC. d/b/a
WEBINOPOLY

Plaintiff,
v.

SHOPIFY, INC.; SHOPIFY COMMERCE
SINGAPORE PTE. LTD.; and SHOPIFY INT.
LTD.,

Defendants.

Civil Action No. 4:23-CV-03348

STIPULATED UNOPPOSED SECOND MOTION TO EXTEND
DEFENDANTS' RESPONSE DEADLINE

Plaintiff High Tech Republic, Inc. d/b/a Webinopoly (“Plaintiff”) and Defendants Shopify Inc., Shopify Commerce Singapore Pte. Ltd., and Shopify International Limited (together, the “Defendants”) file this Stipulated Unopposed Second Motion to Extend Defendants’ Response Deadline, and hereby stipulate and agree as follows:

Plaintiff filed its Original Complaint on September 7, 2023 (*see* Dkt. 1), and requested waiver of service of process from Defendants on September 26, 2024 (*see* Dkt. 31-33). Because Defendants are foreign entities outside of the United States, their original deadline to serve an answer or motion under Rule 12 of the Federal Rules of Civil Procedure was December 26, 2024. *See* FED. R. CIV. P. 4(d)(3).

On December 20, 2024, Defendants filed a Stipulated Unopposed Motion to Extend Defendants’ Response Deadline reflecting the stipulated agreement between Plaintiff and Defendants (collectively, the “Parties”) to extend Defendants’ deadline to respond to the Complaint to January 10, 2025. *See* Dkt. 34.

Given disruptions to coordination between Parties' and their respective counsel that arose as a result of the holidays and travel schedules, the Parties have once again agreed to briefly extend Defendants' deadline to file their response to the Complaint. The Parties accordingly agreed to extend Defendants' response deadline two weeks, or until January 24, 2025.

Therefore, the Parties, by and through their undersigned counsel, stipulate and agree that Defendants' deadline to file their responses to Plaintiff's Complaint is continued to **January 24, 2025**.

CONCLUSION AND PRAYER

For the reasons set forth above, the Parties respectfully request that this Court extend the time for Defendants to file their responses to Plaintiff's Complaint to January 24, 2025, and grant any other relief to which they are entitled at law or in equity.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.

/s/ Eric Chenoweth

Eric Chenoweth